

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Nathan Leftenant, Arnett Leftenant,
Jeryl Bright, Gregory Johnson, and Thomas
“Tomi” Jenkins

Plaintiffs,

v.

Lawrence (“Larry”) Blackmon,
Defendant.

No. 18-CV-01948-EJY

Lawrence (“Larry”) Blackmon,
Counterclaim Plaintiff,

v.

Nathan Leftenant, Arnett Leftenant,
Jeryl Bright, Gregory Johnson, and Thomas
“Tomi” Jenkins

Counterclaim Defendants.

STIPULATED PERMANENT INJUNCTION AS TO NATHAN LEFTENANT

WHEREAS, Counterclaimant Larry E. Blackmon (“Mr. Blackmon” or
“Counterclaimant”) filed trademark related counterclaims in civil action number 1:148cv-01948
in this Court against defendant, Nathan Leftenant (“Mr. Leftenant”).

WHEREAS, Mr. Blackmon is an individual residing in Henderson, Nevada.

WHEREAS, Mr. Leftenant is an individual residing in Memphis, Tennessee.

WHEREAS Mr. Blackmon and Mr. N. Leftenant have reached agreement for resolution
of the remaining pending counterclaims in this Action, the full terms and conditions of which are
set forth in the document entitled “Confidential Settlement Agreement” bearing an effective date
of April 11, 2023 (the “Settlement Agreement”); and

WHEREAS the Settlement Agreement is conditioned upon entry by the Court of a stipulated permanent injunction and the continuing jurisdiction of the Court on the terms and conditions set forth herein;

THEREFOR, Mr. Blackmon and Mr. Leftenant stipulate and agree that (i) this Court has jurisdiction to enter a Stipulated Permanent Injunction on the following terms and conditions and (ii) that the Court shall have continued jurisdiction for purpose of enforcing this Stipulated Permanent Injunction and the Settlement Agreement and (iii) request that the Court enter a Stipulated Permanent Injunction on the following terms:

1. Mr. Nathan Leftenant, his agents, servants, employees, attorneys and all other persons who are in active concert or participation with the foregoing who receive actual notice of this Order by personal service or otherwise ARE HEREBY PERMANENTLY RESTRAINED AND ENJOINED from:

- a. infringing or commercially exploiting the term “CAMEO,” or Original CAMEO Family, except that defendant may describe himself as “formerly of CAMEO so long as the word “CAMEO” is not given more prominence than Mr. Leftenant’s name and the phrase “formerly of CAMEO” is no larger than one-half (1/2) the font size of Mr. Leftenant’s name;
- b. otherwise infringing the U.S. trademark “CAMEO” bearing Registration No. 5,171,059.
- c. Notwithstanding anything herein to the contrary, Mr. Blackmon shall not seek to prohibit Mr. N. Leftenant from (i) using the CAMEO trademark to indicate his former association with the CAMEO band, (ii) from stating that he appears on existing CAMEO sound recordings, or (iii) from participating

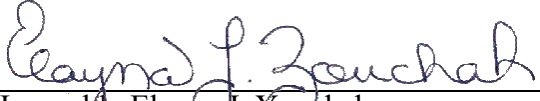
in projects including audio or video interviews, documentaries, films, tv shows or other stories about his history with CAMEO, based a claim of infringement of the CAMEO trademark. Mr. Blackmon shall not enforce the CAMEO Trademark Rights against Mr. N. Leftenant for third parties that discuss or describe Mr. N. Leftenant's relationship to CAMEO.

2. Not later than fifteen (15) days prior to any event, including but not limited to musical performances, appearances and interviews, involving Mr. Leftenant and in which Mr. Leftenant's prior affiliation with CAMEO will be discussed, publicized, or promoted (hereinafter a "covered event"), Mr. Leftenant shall provide a copy of this Stipulated Permanent Injunction to all booking agents, promoters, producers, and venues with whom Mr. Leftenant has a contractual relationship.

3. Within thirty (30) days of entry of this Injunction, Mr. Leftenant agrees to request removal of the sound recording entitled "We in the House" from the following services: Tidal (www.tidal.com), Spotify (www.spotify.com), KKBOX (www.kkbox.com), JioSaavn (www.jiosaavn.com), iHeart (www.iheart.com) and SoundCloud (www.soundcloud.com) and to provide written confirmation to Mr. Blackmon of such requests. Mr. Blackmon agrees to take all reasonable actions requested by any of the services in order to effectuate removal.

4. The Clerk is directed to enter this Stipulated Permanent Injunction forthwith as a Final Judgment.

IT IS SO ORDERED this 11th day of April, 2023.


Honorable Elayna J. Youchak
United States Magistrate Judge

APPROVED AND AGREED TO BY:

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